

February 25, 2019

Via CM/ECF and FedEx

The Honorable Steven C. Mannion
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Court Room MLK 2B
Newark, New Jersey 07101

**Re: Strategic Delivery Solutions, LLC v. Stallion Express, LLC, et al., Case No.
2:18-cv-08779-MCA-SCM; Request to File Motion**

Dear Judge Mannion:

We represent Defendants Stallion Express, LLC, Timothy Kravitz, and Chris Sahadi (collectively, the “Defendants”) in the above-referenced action. Pursuant to Paragraph 13 of the Pretrial Scheduling Order [Doc. 32], we write to request leave to file a motion to extend time to respond to *Plaintiff’s Supplemental Memorandum of Law in Support of Plaintiff’s Motion for Sanctions and Related Relief Pursuant to F.R.C.P. 37(a)(1)* [Doc. 66] (the “Supplement to the Motion to Compel”).

Defendants respectfully request an additional week—*i.e.*, through and including March 7, 2019—to respond to the Supplement to the Motion to Compel. The basis for the request is two-fold. First, while couched as a “supplement,” Plaintiff’s filing raises many new arguments not contained in its original motion to compel. Second, Defendants’ counsel’s has several out-of-state Court appearances and meeting next week. While we have been diligently working to respond to the Supplement to the Motion to Compel within the two weeks originally provided by the Court, we believe the Court will benefit from a more fulsome response that the additional week will provide. Moreover, at the last status conference, the Court indicated that if Defendants need more than two weeks to respond, it would consider the request. The hearing on the Motion to Compel is April 10, 2019, so Plaintiff will not be prejudiced by this request.

Thus, for the reasons stated, Defendants respectfully request leave to file a motion to extend their time to respond to the Supplement to the Motion to Compel by one week— *i.e.*, through and including March 7, 2019.

Prior to filing this request, Defendants provided a copy of this letter to Plaintiff and sought its consent to the requested one-week extension. Plaintiff refused to consent

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We are available at the Court's convenience to answer any questions.

Respectfully submitted,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

/s/ Kevin M. Capuzzi

Kevin M. Capuzzi (NJ No. 173442015)

cc: All counsel of record